

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

C.A. No. 05-11267-MEL  
DISTRICT OF MASS.

MADHU JAIN, )  
PLAINTIFF )  
v. )  
A CAPE ANN WHALE )  
WATCH, INC. )  
DEFENDANT )

**PLAINTIFF'S MOTION UNDER TO ADMIT THE MEDICAL REPORT OF DR.  
HAHN AND OBTAIN COPY OF I.M.E. BY DOCTOR THAKUR**

Plaintiff traveled to Boston from New Deli and submitted herself to two I.M.E.s.  
by the defendant's doctors (Dr. Thakur and Dr. Hahn)

The results of the Dr. Thakur I.M.E. was withheld.

The report of Dr. Kyung Ae Hahn was provided to Plaintiff by Defendant.

Plaintiff requests that Hahn records be admitted into evidence. They are probative  
and the circumstances are trustworthy.

Plaintiff requests that the second I.M.E. be provided under Rule 35 (b) 1:


If requested by ... the person examined, the party causing the  
examination to be made shall deliver to the requesting party a copy  
of the detailed written report...

It was requested (Exhibit 1)

Defendant should not be allowed to demand that plaintiff submit to Dr Thakur  
and then withhold the results.

WHEREFORE, the plaintiff respectfully moves that the Court order production of  
the Thakur material and admit the Hahn I.M.E. report.

By the Plaintiff,

  
\_\_\_\_\_  
JEFFREY C. CONIARIS  
BBO# 555907  
84 State Street  
Boston, MA 02109  
(617) 720-5888

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each party and any party appearing pro se by ~~(first class mail, postage prepaid) or (by hand delivery).~~

Dated 6/6/07 

July 27, 2006

Michael Rauworth  
Cetrulo & Capone L.L.P.  
World Trade Center East  
Two Seaport Lane 10<sup>th</sup> Floor  
Boston Massachusetts 02210

RE: MADHU JAIN v A CAPE ANN WHALE WATCH INC.  
CIVIL ACTION 05 11267 MEL  
United States District Court

Dear Michael,

Would you please send me?

1. Copies of photographs of Ms. Jain's ankle taken at her deposition
2. More legible copies of the copies of photographs of the Hurricane II and the gangway that you produced in your response to my requests for production of documents
3. Documents generated by Dr. Thakur relative to your I.M.E of plaintiff.

Thank you for your attention to this matter.

Very truly yours,

JEFFREY C. CONIARIS  
84 STATE STREET  
BOSTON, MA 02109  
BBO 555907  
(617) 720-5888